

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	Criminal No. 21cr10001
	)	
v.	)	Violation:
	)	
NEAL GRUBERT,	)	<u>Count One:</u>
	)	Advertising Child Pornography
Defendant	)	(18 U.S.C. §§ 2251(d) and (e))
	)	
	)	<u>Forfeiture Allegation:</u>
	)	(18 U.S.C. § 2253)
	)	

INDICTMENT

COUNT ONE

Advertising Child Pornography  
(18 U.S.C. §§ 2251(d) and (e))

The Grand Jury charges:

On or about June 14, 2020, in the District of Massachusetts and elsewhere, the defendant,

NEAL GRUBERT,

knowingly published a notice and advertisement offering to display, distribute, and reproduce a visual depiction, the production of which involved the use of a minor engaging in sexually explicit conduct, knowing and having reason to know that such notice and advertisement would be transported using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including computer, and such notice and advertisement was actually transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including computer.

All in violation of Title 18, United States Code, Sections 2251(d) and (e).

FORFEITURE ALLEGATION  
(18 U.S.C. § 2253)

1. Upon conviction of the offense in violation of Title 18, United States Code, Sections 2251(d) and (e), set forth in Count One, the defendant,

NEAL GRUBERT,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, (i) any visual depiction described in sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 2253, as a result of any act or omission of the defendant—

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States of America, pursuant to Title 18, United States Code, Sections 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL



FOREPERSON



ANNE PARUTI  
ASSISTANT UNITED STATES ATTORNEY  
DISTRICT OF MASSACHUSETTS

District of Massachusetts: January 05, 2021  
Returned into the District Court by the Grand Jurors and filed.

/s/ Thomas F. Quinn 1/5/2021 @ 1:25  
DEPUTY CLERK